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CALIFORNIA EMERGENCY MANAGEMENT AGENCY

July 9, 2010

Kathy Romans Program Manager Antelope Valley Domestic Violence Council P.O. Box 2980 Lancaster, CA 93539

Subject:

Grant Award # AT09061195 Site Visit Report

Dear Ms. Romans:

On June 14 - 15, 2010, I conducted a site visit of the Child Abuse Treatment (CHAT) Program operated by Antelope Valley Domestic Violence Council (AVDVC). Thank you for your time and cooperation during the site visit. It was a pleasure meeting you and the staff who support the CHAT Program.

During the site visit, we discussed California Emergency Management Agency's requirements for the program, the goals and objectives, the match requirements, the source documentation, and the reporting requirements. As a result of the visit, I have found the project in most areas to be in compliance and functioning within the parameters established in the Grant Award Agreement. However, there were some findings (out-of-compliance) which require corrective actions. Please send me a corrective action letter by **August 6, 2010** addressing the following topics:

Overall, the Administrative Review appears to be satisfactory. However, there are five administrative issues needing to be addressed:

1) AVDVC did not have CEQA documentation as required by the Cal EMA Recipient Handbook, Section 2153.

Action Needed:

Per 2009 Cal EMA Recipient Handbook, Section 2153, the project must certify it is in compliance with CEQA. The project should get a letter from the appropriate local government authority stating the project is in compliance with or is exempt from CEQA requirements. Indicate in the corrective action letter how this will be resolved.

2) Darryl Kniss, CFO, could not locate a Proof of Authority written authorization/resolution as required by the Grant Award Agreement (R.H. Section 1350).

Action Needed:

Per 2009 Recipient Handbook, Section 1350, the project must obtain written authorization from the governing board that the official executing the Grant Award Agreement is authorized to do so. It is best to use the official's title rather than the personal name in this written authorization, so if that person leaves, the new person taking over the position can still sign for the project. Indicate in the corrective action letter how this will be resolved.

3) Darryl Kniss, CFO, could not provide proof the Board of Directors approved the personnel policies.

Action Needed:

The Board of Directors needs to approve the personnel policies. Indicate in the corrective action letter how this will be resolved.

4) The agency's CHAT Program General Ledger categories do not all match the Grant Award Budget categories.

Action Needed:

Per Recipient Handbook, Section 6420.1, "Expenditures of grant funds must be recorded in categories which parallel the Grant Award." Please submit a Grant Award Modification Request (Cal EMA Form 2-223) and budget forms to include any AVDVC CHAT Program General Ledger category within a line item or as its own line item in the Grant Award Budget. Include new Budget Narrative pages to describe what category it will be included in and how this will benefit the program. Indicate in the corrective action letter how this will be resolved.

5) EEO Policy –

- Darryl Kniss, CFO, could not provide a copy of a help wanted publication with an EEO statement.
- b. AVDVC does not have a plan to disseminate the EEO Plan and the EEO Policy to all employees, volunteers, clients and to the general public. I provided AVDVC with a copy of a sample dissemination plan.
- c. AVDVC did not have a Limited English Proficiency Plan. I provided AVDVC with a copy of a sample Limited English Proficiency Plan.

Action Needed:

a. In the future, AVDVC staff must include an EEO statement on any help wanted ads it publishes. Indicate in the corrective action letter how this will be resolved.

- b. AVDVC staff must produce a plan to disseminate the EEO Plan and the EEO Policy to all employees, volunteers, clients and to the general public, and have the plan approved by its Board of Directors. Indicate in the corrective action letter how this will be resolved.
- c. AVDVC staff must produce a Limited English Proficiency Plan, and have the plan approved by its Board of Directors. Indicate in the corrective action letter how this will be resolved.

Overall, the Programmatic Review appears to be satisfactory. However, there are four programmatic issues needing to be addressed:

1) Client files -

- a. The client files do not include insurance information. It is therefore unknown if the client has private insurance, Medi-Cal, or no insurance.
- b. One of the redacted client files indicated family therapy was part of the treatment plan.

Action Needed:

- a. Per VOCA CHAT Program guidelines, only children who are un-served or under-served may be provided with therapy. AVDVC staff needs to include insurance information in the client file. Clear documentation must be provided in the file when the child qualifies to be treated under the CHAT Program if the child does have other forms of insurance such as private insurance or is eligible for Medi-Cal. Indicate in the corrective action letter how this will be resolved.
- d. The CHAT Program only provides therapy for children. Family therapy is not allowed. However, AVDVC staff may advice the parent and/or guardian on ways to assist the child in recovering from his/her trauma. Indicate in the corrective action letter how this will be resolved.
- 2) Darryl Kniss, CFO, informed me Patricia Jones is splitting the .12 FTE Clinical Supervisor position with Carol Crabson. This information is not included in the current Grant Award or on the 6-month Progress Report.

Action Needed:

Please submit a Grant Award Modification Request (Cal EMA Form 2-223) to include Patricia Jones in the Budget Narrative for this position. Please also include her in future Progress Reports. Indicate in the corrective action letter how this will be resolved.

3) The volunteer which AVDVC utilizes does not complete a functional timesheet and does not appear to be completing enough volunteer hours to equal the 1 FTE listed on the current Grant Award Budget. Darryl Kniss, CFO, stated the

volunteer mans a booth at special event and fairs in order to publicize the CHAT Program. Darryl Kniss also stated it is very difficult to find volunteers.

Action Needed:

Volunteers must complete functional timesheets, especially when their time is being used as an In-Kind-Match on the Grant. A functional timesheet must be utilized in order to track the volunteer's total hours. If AVDVC is having difficulty in obtaining volunteers, AVDVC staff may request to waive the requirement to utilize volunteers for the current grant award. Indicate in the corrective action letter how this will be resolved.

4) Darryl Kniss, CFO, stated AVDVC does employee evaluations only during the first year of employment.

Action Needed:

Employee evaluations, at a minimum, need to be done on a yearly basis. Indicate in the corrective action letter how this will be resolved.

Please review the enclosed Performance Assessment/Site Visit Report form; sign the cover page and mail it to me at your earliest convenience. Also complete a Corrective Action Letter with the requested actions and return to me by **August 6, 2010.** Should you have questions, please contact me at

(916) 323-7730. Once again, I thank you and your staff for meeting with me and being so helpful.

Sincerely,

RICHARD BUNCH Program Specialist Children's Section

Enclosures:

- Site Visit Report
- EEO Checklist

CALIFORNIA EMERGENCY MANAGEMENT AGENCY (Cal EMA) PROGRAM: CHILD ABUSE TREATMENT PROGRAM (CHAT) PERFORMANCE ASSESSMENT / SITE VISIT REPORT

GRANT AWARD NUMBER	: _AT09061195	DATE OF SITE VIS	ST: <u>06/14 – 15/2010</u>
GRANT PERIOD: Octobe	r 1, 2009 throug	gh September 30, 2010	
RECIPIENT/IMPLEMENTI	NG AGENCY:	Antelope Valley Domesti	c Violence Council
PROJECT DIRECTOR: Katl	ny Romans		
PERSONS INTERVIEWED D			
NAME	TITL		AGENCY
			AGENCI
Kathy Romans	Progra	m Manager	
Darryl Kniss	Chief	Financial Officer_	
Carol Crabson, LCSW	Chief	Executive Officer_	
Christine Disimile	Therap	pist	8
Patricia Jones	Chief	of Community Services	
	.a e		
	-a s		
Richard Bunch	07/09/2010	Gillsa Miller	07/09/2010
Signature of Program Specialist	Date	Signature of Section Ch	nief Date
*			
C'. CD.			
Signature of Project Representative	e Date		

ADMINISTRATIVE REV	TIEW			
1. OPERATIONAL DOC	CUMENTS	YES	NO	<u>N/A</u>
 The Program Guidelin Is the project familiar OMB Circulars which found at www.whiteho 	nt Handbook (R.H.)			
Comments:				
2. FIDELTY BOND - CO	MMUNITY BASED ORGANIZATION (CBO) & AME	RICA	N INDL
ORGANIZATIONS O	NLY			
	d CBO bonding? [R.H. Section 2161] Does or county units of government.			
 Bonding compa 	ny name			
Bond numberDescription of of	coverage	X	H	H
	erage (50% of allocation)		H	H
 Bond period 		\boxtimes		
o Grant award nu		\boxtimes		
Bond include For (Forgery Coverage)	orm A (Employee Dishonesty) and Form B	\boxtimes		Ш
	ned on the bond as the beneficiary?	\boxtimes		П
Comments:			_	
	d Certificate of Liability Insurance which met all r	equiremen	ts.	
3. ENVIRONMENTAL I	MPACT – CEQA COMPLIANCE (R.H. Section	on 2153)		
• Does the project have	their CEQA documentation on file?		\boxtimes	
Comments:				
Darryl Kniss, CFO, is worki	ng on getting CEQA Exemption letter for the new	location		
4. PROOF OF AUTHOR	ITY (R.H. Section 1350)			
	written authorization/resolution on file as ward Agreement? *Ask for copy			
Comments:				
Darryl Kniss, CFO, could no	t find proof of authority documentation.			

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AL	OMINISTRATIVE REVIEW (Continued)	000, 2000 - 2000		
_	ODC AND ATION AT CHART	<u>YES</u>	<u>NO</u>	N/A
Э.	ORGANIZATIONAL CHART			
•	Review the organizational chart. Are all budgeted positions	\boxtimes		
	identified?		Ш	
Cor	nments:			
	rryl Kniss, CFO, provided an up-to-date organizational chart.			
6.	Cal EMA MODIFICATION (Cal EMA 2-223)			
	D : 1			
•	Review the purpose/preparation of Grant Award Modification	\boxtimes		
	(Cal EMA 2-223). [R. H. Section 7500] (Instruct the project staff on the procedure to obtain the most recent forms from Cal EMA			
	website.)			
	A modification is needed for the following:			
	 Budget changes 			
	 Change in key personnel 			
	 Adding/changing additional signers 			
	Change goals/objectives, or activities			
	o Address change			20
	o Other			
Con	nments:			
Da	rryl Kniss and Kathy Romans understood the reason for submitting a modificat	ion.		
7	DEDCONNEL DOLLCIES			
7.	PERSONNEL POLICIES			
•	Does the project staff have access to written personnel policies as	\boxtimes		
	required? [R. H. Section 2130]			
•	Do policies include:			
	o Maintenance of personnel files for all paid and volunteer	\boxtimes		
	staff including job applications, salaries, benefits, and current job duties/descriptions			
	A current Drug Free Workplace policy statement on file	\boxtimes	П	
	signed by the employee? [R. H. Section 2152]		ш	Ш
	Work hours	\bowtie	П	
	 Compensation rates 	\boxtimes		
	o Overtime	\boxtimes		
•	Did the Board approve the agency's current personnel policy?		\boxtimes	

Comments:

<u>Darryl Kniss, CFO, could not provide proof the Board of Directors had approved current personnel policies.</u>

The policies and Employee Handbook are currently being revised and I was told the agency will seek Board approval of the updated policies and Employee Handbook.

Α.	ADMINISTRATIVE REVIEW (Continued)				
		YES	NO	N/A	
	8. <u>FUNCTIONAL TIMESHEETS</u>				
	 Does the project use functional timesheets for each grant funded position less than 1 FTE? OR Time Study Allocation plan updated within the last 2 years? [R. H. Section 11331] 				
	 Are timesheets (paid staff & volunteer) signed by staff & approved by supervisor? (Review timesheets to ensure they are signed by the staff and supervisor) 				
	Comments: The project uses functional timesheets which are signed by the staff and approved supervisor. 9. DUTIES OF FINANCIAL OFFICER AND BOOKKEEPER	l and sig	gned by	<u>'a</u>	3
	 DUTIES OF FINANCIAL OFFICER AND BOOKKEEPER Are the duties of the financial officer and the bookkeeper separate to ensure no one person has complete authority over a financial transaction? Name of individual who approves purchases. 	\boxtimes			
	 Darryl Kniss - CFO and Carol Crabson - CEO Name of individual who writes checks. Toni Severino – Assistant Accountant Name of individual(s) who signs checks. Carol Crabson - CEO, Theresa Dawson – Board President 				
	10. SOURCE DOCUMENTATION-Fiscal [R. H. Section 11000]				
	 Does the project maintain a record-keeping system which will accurately support costs claimed on Report of Expenditure and Request for Funds (Cal EMA Form 2-201)? 				
	 Does the project maintain an accurate inventory log of equipment purchased with grant funds? 	\boxtimes			
	Comments: Categories on CHAT Program General Ledger need to match grant hudget categories	rios O	thorwis	٥	

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the project will need to do a Modification Request to change grant budget categories.

. AI	OMINISTRATIVE REVIEW (Continued)					
11.	PROJECT EXPENDITURES	YES	<u>NO</u>	NO		
•	Is the project's expenditure rate commensurate with the elapsed period of the grant?	\boxtimes				
•	Are the project's expenditures being made in accordance with the terms of the Grant Award Agreement?	\boxtimes				
•	Does the project need to submit a Grant Award Modification Request (Cal EMA Form 2-223)?	\boxtimes				
•	Is the project up-to-date with the submission of Cal EMA Form 2-201?	\boxtimes				
	Comments: AVDVC needs to submit a Modification Request to add budget categories to grant budget in order for it to match the CHAT General Ledger of the agency.					
12.	MATCH REQUIREMENTS					
•	Does the project have a match requirement? Is the project meeting the match requirement? Review the supporting documentation to substantiate cash or in-kind match.					
	ed functional timesheet to track volunteer time for CHAT Program.					
13.	EEO POLICY					
•	Go over EEO checklist. (Separate document)	\boxtimes				
Iten age	nments: n #5 - Project did not have a copy of a publication for employment. It has been new recruited for any positions. In the future, AVDVC needs to include an EE ruiting material.	n over 1 O stater	½ year	rs since any	<u>the</u>	
volu	n #9 – AVDVC does not have a plan to disseminate the EEO Plan and the EEO anteers, clients and to the general public. I gave Darryl Kniss, CFO, a copy of DVC needs to develop this plan and have it approved by the Board of Director	attachn	to all ent 102	employe A.	ees,	
atta	Item #10 – AVDVC does not have a Limited English Proficiency Plan. I gave Darryl Kniss, CFO, attachment 11A. AVDVC needs to develop a Limited English Proficiency Plan and have it approved by the Board of Directors.					

В.	PROGRAMMATIC REVIEW			
	GENERAL	YES	NO	N/A
	1. PROGRAM GOALS AND OBJECTIVES			
	 Review the goals and objectives of the program and the programmatic requirements of the Grant Award Agreement. Is the project meeting the program goals and objectives? 	\boxtimes		
	 Does the project staff need to submit Cal EMA Form 2-223 to modify their grant objectives? 	\boxtimes		
	Comments: The project is on track to meet Objective goals A, B and C.			
	2. PROGRESS REPORT			
	• Discuss and review the programmatic Progress Report requirements. Comments:	\boxtimes		
	Darryl Kniss and Kathy Romans understands Progress Report requirements.			
	3. SOURCE DOCUMENTATION-Programmatic			
	 Is the project maintaining a record keeping and data collection process that will accurately support the project's reported data on the Progress Report form? Review the project's file system and data collection process. 			
	Project staff only counts a child for Objective A if the child shows up for a second files do not include information on insurance. The project needs to justify how a Program services if he/she has private insurance or Medi-Cal.	d appoin client qu	tment.	Client for CHAT
	4. OPERATIONAL AGREEMENTS			
	 Does the project have current Operational Agreements as required by the Grant Award Agreement? 		\boxtimes	
	Comments: The project had all required OA's except for one with a local hospital.			
	5. PROJECT STAFF DUTIES			
	 Interview project staff and discuss their duties and the relationship to the grant. Are employees performing duties as stated in the Grant Award Agreement? 			
	Comments: Patricia Jones splits the .12 FTE Clinical Supervisor position with Carol Crabson.	A Mod	ificatio	n Request

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Progress Reports.

will need to be submitted to add Patricia Jones onto the grant. She also needs to be included in future

SUPPLEMENTAL PROGRAMMATIC REVIEW			
SOTTEDMENTAL I ROGRAMMATIC REVIEW	VEC	NO	NI/A
1. OBJECTIVE A – PROVIDE PSYCHOTHERAPY SERVICES	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Does the project use licensed clinicians/therapists? If not, explain	\boxtimes		
the credentials of the mental health staff. Discuss the type of therapy		_	_
received by the child client (how often, group, individual, PCIT,			
trauma-focused, etc.).			
Comments:			
Project uses EMBR, PCIT, Play, Art, and San Tray Treatment modalities.			
2. OBJECTIVE B – ASSISTANCE IN PROVIDING			
INFORMATION ON CRIME COMPENSATION SERVICES			
How does the project provide clients with information and referral to	\bowtie		
the local Victim Witness Assistance Center for victim compensation	()	S. Taranta	
services?			
Comments:			
Project staff gives brochures to all CHAT Program clients.			
3. OBJECTIVE C - ASSISTANCE IN UNDERSTANDING AND			
IN HELPING THE CHILD PREPARE FOR PARTICIPATING			
IN THE CRIMINAL JUSTICE SYSTEM			
How does the project provide information and referral to the local	\boxtimes		
Victim Witness Assistance Center for assistance, advocacy and			
support during judicial proceedings?			
Comments:			
Project staff refers clients to D.A.'s office. Project staff stated in the Lancaster a	rea, chile	d abuse	and sex
assault cases are rarely prosecuted, as it is a low priority for the D.A. and courts.			
4. OBJECTIVE D – USE OF VOLUNTEERS			
Does the project use volunteers?	\boxtimes		
Have volunteers completed the required 40-hour training			
prior to child client contact? Review documentation.	\boxtimes	П	
 Do volunteers complete a sign-in sheet with date, time, 			
activities and signature by the project's project director or		\boxtimes	
designated staff? Review documentation.			
Have all employees and volunteers completed the required			
background checks?	\boxtimes		Ш
If the project does not use volunteers, has the project received a volunteer project for the project received a volunteer project for the project for t			\square
received a volunteer waiver for the <u>current grant award</u> <u>period</u> ?			\boxtimes
periou:			
How does the project use the mandated volunteers?			

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functional timesheet.

A volunteer mans booths at fairs and events to promote CHAT Program. The volunteer does not use a

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C.	SUPPLEMENTAL PROGRAMMATIC REVIEW	725-2512-523			
		<u>YES</u>	<u>NO</u>	N/A	
	5. DOES THE RECIPIENT HAVE ON FILE				
	DOCUMENTATION SUPPORTING THE COMPLETION OF				
	THE FOLLOWING (inform the following are required, but do				
	not review)?				
	 Reference Checks 	\boxtimes	Ш	Ш	
	 Criminal Background Check (if staff/volunteers have resided 	\boxtimes	П		
	in California for less than 3 years, out-of-state criminal		ш		
	history checks are also required) Ohild Abuse Central Index Checks			\boxtimes	
	 Department of Motor Vehicle Checks (if transporting clients) 	\boxtimes			
	Comments:			12	7000 SE
	Darryl Kniss, CFO, states the above are completed. Background check is destrein personnel files.	oyed, but i	noted a	s comple	eted
	6. DOES THE PROJECT DO PERFORMANCE		\boxtimes		
	EVALUATIONS?				
	Comments:				
	Darryl Kniss, CFO, states the agency only does performance evaluations for new	w employe	es the	first year	of
- 10	their employment. None are done thereafter.				
	7. CURRENT MANDATED OA'S ON FILE				
	Law Enforcement				
	California Coalition for Youth (CCY)	\bowtie	Н	Ц	
	Victim Witness Assistance Center	X	H	Н	
	 California Workforce Investment Board's State or Local 				
	Youth Council	\boxtimes		П	
	 Local Hospitals 	Ħ	П	Ħ	
	 Local Schools 	\boxtimes			
	 County Social Services Department 				
	Comments				
	Comments: The project has all required OA's.				
	The project has all required OA's.				
	8. <u>CLIENT CONFIDENTIALITY</u>				
	 Written policy regarding client confidentiality. 				
	Written policy regarding the maintenance of confidential	X	H	H	
	client records.				
	 Client records are kept confidential per E.C. Section 1037.1. 	\bowtie			
	 Client records are kept in a locked room or file cabinet. 	\boxtimes	Ħ	\sqcap	
		·			

Project has the above required policies. Client files are kept in a locked file cabinet in a locked room.

D. ADDITIONAL COMMENTS:

ADMINISTRATIVE (document strengths, topics needing improvement, follow-up, etc.)

During my site visit to Antelope Valley Domestic Violence Council, the staff provided great hospitality and definitely made me feel welcome. Everyone was very helpful in providing the information which I requested.

Antelope Valley Domestic Violence Council, Kayla's Place CHAT Program appears to be run very professionally. The staff is friendly, organized and competent.

The following are the findings of the site visit:

- 1. The project did not have CEQA documentation as required by the Cal EMA Recipient Handbook, Section 2153. The project needs to obtain a CEQA exemption letter.
- 2. Darryl Kniss, CFO, could not locate a Proof of Authority written authorization/resolution as required by the Grant Award Agreement (R.H. Section 1350). AVDVC needs to obtain authorization from the Board of Directors for the Project Director to execute the Grant agreement.
- **3.** Darryl Kniss, CFO, could not provide proof the Board of Directors approved the current personnel policy. AVDVC needs to obtain approval of the personnel policy from the Board of Directors.
- 4. The CHAT Program General Ledger categories do not all match the Grant Award Budget categories. Per Recipient Handbook, Section 6420.1, "Expenditures of grant funds must be recorded in categories which parallel the Grant Award." AVDVC will need to alter the CHAT Program General Ledger or submit a Modification Request to adjust the grant budget categories.
- 5. EEO Policy -
- a) The project did not have a copy of a publication for employment. AVDVC needs to include an EEO statement on all future publications for employment.
- b) The project did not have a plan to disseminate the EEO Plan and the EEO Policy to all employees, volunteers, clients and to the general public. AVDVC needs to develop such a plan and have it approved by the Board of Directors.
- c) The project did not have a Limited English Proficiency Plan. AVDVC needs to develop such a plan and have it approved by the Board of Directors.

PROGRAMMATIC (document strengths, topics needing improvement, follow-up, etc.)

Programmatically, AVDVC appears to be run very professionally and the clients appear to be well served.

The following are findings of the Site Visit:

- 1. Client files -
- a) The client therapy files do not include client insurance information. It is therefore unknown if the client has private insurance, Medi-Cal or no insurance. The project may only provide therapy services to children who are un-served or under-served. The project needs to include insurance information in the client files, and if a client has private insurance, the project must justify why they qualify for CHAT services.
- b) One of the client files indicated family therapy was part of the treatment plan. Family therapy is not allowable in CHAT Program. The project can only provide therapy to the child, and support services to the parent or care provider to assist the child in his/her treatment.
- 2. Darryl Kniss, CFO, informed me Patricia Jones is splitting the .12 FTE Clinical Supervisor position with Carol Crabson. This information is not included in the current Grant Award or on the 6-month Progress Report.
- **3.** The volunteer does not complete a functional timesheet. If a volunteer is utilized, the project needs to use a functional timesheet in order to use his/her time for match, and to meet the requirement for Objective D, use of volunteers.
- **4.** Darryl Kniss, CFO, states AVDVC does employee evaluations only during the first year of employment. The project should be doing at a minimum, yearly employee evaluation for all employees.